

REMARKS

This is a full and timely response to the outstanding final Office Action mailed November 1, 2007. Reconsideration and allowance of the application and pending claims are respectfully requested.

I. Allowable Subject Matter

Applicant appreciates the Examiner's indication that claims 18-20 would be allowable if rewritten to include all of the limitations of the base claim and any intervening claims. In that it is believed that every rejection has been overcome, it is respectfully submitted that each of the claims that remains in the case is presently in condition for allowance.

II. Claim Rejections - 35 U.S.C. § 102(b)

Claims 1, 2, 4, 10-12, and 14-17 have been rejected under 35 U.S.C. § 102(b) as being anticipated by *Kemp* (U.S. Pub. No. 2002/0078160). Applicant respectfully traverses.

It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed invention must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(b).

In the present case, not every feature of the claimed invention is represented in the Kemp reference. Applicant discusses the Kemp reference and Applicant's claims in the following.

A. The Kemp Disclosure

Kemp discloses a system and method for printing over the Internet. The system includes a client computer 10, a portal 3, and a service provider 3. *Kemp*, paragraphs 0035 and 0036. A user generates a document to be printed by the service provider 3 on the client computer 10. *Kemp*, paragraph 0075. The portal 3 provides a print driver 282 on the client computer 10 with information as to the service provider 3. *Kemp*, paragraph 0042. The service provider 3 (e.g., print shop) receives and processes print jobs from the client computer 10. *Kemp*, paragraphs 0086 and 0087.

B. Applicant's Claims

As is noted above, Kemp fails to teach several of Applicant's claim limitations. Applicant discusses some of those claim limitations in the following.

1. Claims 1, 2, 4, and 14

Applicant's independent claim 1 provides as follows:

1. A method of managing workflow in a commercial printing environment including a designer location and a print service provider location, said method comprising:

a digital printer establishing a closed-loop communication link between the designer location and the print service provider location;

the digital printer sending current configuration information stored within memory of the digital printer to the designer location via the closed-loop communication link;

creating a press ready file at the designer location using the current configuration information received from the digital printer via the closed-loop communication link;

submitting the press ready file from the designer location to the print service provider location via the closed-loop communication link;

receiving at the print service provider location a printed output of the press ready file from the digital printer; and

packaging the printed output at the print service provider location using an automated packaging device.

As a first matter regarding claim 1, Kemp does not teach "a digital printer establishing a closed-loop communication link between the designer location and the print service provider location". Regarding paragraph 0035 of the Kemp reference, which was relied upon by the Examiner, Kemp describes the network configuration shown in Figure 1. As is clear from Figure 1, no digital printer of Kemp's network is shown "establishing" a communication link with anything. Instead, depicted in Figure 1 is a "client/@home user 1" being connected to a "service provider 2" via the Internet 5.

Regarding Figure 2, which was also cited by the Examiner, Kemp merely depicts a computer workstation 10 of the client 1 and a server 20 of the service provider 2 connected via the Internet 5. Therefore, neither Figure 1 nor Figure 2 show the action of a digital printer “establishing” a communication link.

Second, Kemp does not teach “the digital printer sending current configuration information stored within memory of the digital printer to the designer location via the closed-loop communication link”. Although Kemp describes a portal server 30 obtaining service provider information that meets “search criteria” provided by the user (*Kemp*, paragraph 0062), the portal server 30 is not a “digital printer” and the search criteria is not described as comprising “configuration information” regarding the digital printer. Furthermore, although Kemp describes a service provider server 20 of the service provider consulting a look-up table that includes all of the “capabilities” of the print shop (*Kemp*, paragraph 0084), the service provider server 20 is not a “digital printer” and Kemp does not state that such “capabilities” comprise “configuration information” of a digital printer.

Regarding the Examiner’s block-copying Applicant’s claim limitation and providing a citation to “Figs. 1 and 3 and paragraphs 55-58, 60-62, 69-71, and 84-87” without explanation, the Examiner has failed to clearly state the reasons why he believes that the limitation is taught by Kemp and therefore has denied Applicant a full and fair hearing and a full opportunity to respond. See MPEP 706.07. Applicant therefore requests that the Examiner identify *with particularity* the various lines of those paragraphs that the Examiner believes to teach “the digital printer sending current configuration information stored within memory of the digital printer to the designer

location via the closed-loop communication link” and *provide an explanation* as to why the Examiner believes those specific lines teach that limitation. Applicant has reviewed each of the cited figures and paragraphs of the Kemp reference and can find no teaching of “the digital printer sending current configuration information stored within memory of the digital printer to the designer location via the closed-loop communication link”.

Third, Kemp does not teach “creating a press ready file at the designer location using the current configuration information received from the digital printer via the closed-loop communication link”. Because Kemp does not teach a digital printer providing current configuration information to the user, it logically follows that Kemp does not teach the user creating a press ready file “using the current configuration information received from the digital printer”.

In view of at least the above, Applicant submits that Kemp does not anticipate claim 1 or the claims that depend therefrom. Applicant therefore requests that the rejections be withdrawn.

2. Claim 10

Applicant's independent claim 10 provides as follows:

10. An automated packaging device for use with a design-to-press workflow in a commercial printing environment including a designer location, a print service provider location, and a closed-loop communication link between them, said automated packaging device comprising:

- a memory for storing current configuration information about the automated packaging device; and

- a communication module for connecting to the closed-loop communication link to communicate the current configuration information to the designer location and the print service provider location for consideration in design and preflight stages of the workflow.

Regarding claim 10, Applicant notes that Kemp does not teach an “automated packaging device”. Although the Examiner identifies that Kemp in paragraph 0041 states that “service provider 2 may include various equipment for performing finishing processes of print requests” Applicant notes that “finishing” is not “packaging”. In particular, “finishing” refers to such actions as folding, stapling, or binding a printed output while “packaging” refers to packaging the finished output for shipment. Therefore, Kemp’s disclosure of finishing devices is not a disclosure of a “packaging device”. Furthermore, although Kemp states in paragraph 0064 that a user can “select from among various methods of delivery,” such a disclosure is not a disclosure of an “automated packaging device”. For all the reader knows, Kemp’s print shop prints and finishes documents and then provides them to another undisclosed provider for packaging, which may or may not

use a packaging device. Regardless, without actual or inherent disclosure of an “automated packaging device”, Kemp cannot be said to anticipate claim 10.

As a further matter regarding claim 10, Applicant notes that Kemp does not teach an automated packaging device comprising “memory for storing current configuration information about the automated packaging device”. Again, Kemp does not even mention an automated packaging device. It follows then that Kemp does not teach an automated packaging device that comprises memory for storing current configuration information about the automated packaging device.

Furthermore, Kemp does not teach an automated packaging device comprising “a communication module for connecting to the closed-loop communication link to communicate the current configuration information to the designer location and the print service provider location for consideration in design and preflight stages of the workflow”. Again, Kemp does not even mention an automated packaging device. It follows that Kemp does not teach an automated packaging device that comprises a communication module for communicating its current configuration information to the designer location and the print service provider location for consideration in design and preflight stages of the workflow.

In view of at least the above, Applicant submits that Kemp does not anticipate claim 10. Applicant therefore requests that the rejection be withdrawn.

3. Claims 11, 12, and 15-17

Applicant's independent claim 11 provides as follows:

11. A system for managing workflow in a commercial printing environment, said system comprising:

a digital printer comprising memory that stores current configuration information about the digital printer and a communications module that is used to communicate with other devices over a network, wherein the digital printer is configured to:

establish a closed-loop communication link with a designer location at which print jobs are created and with a print service provider location at which the print jobs are processed,

send the current configuration information stored within digital printer memory to the designer location via the closed-loop communication link, and

generate printed outputs associated with the print jobs; and

an automated packaging device comprising memory that stores current configuration information about the packaging device and a communications module that is used to communicate with other devices over a network, wherein the digital printer is configured to:

communicate over the closed-loop communication link with the designer location and with the print service provider location,

send the current configuration information stored within the packaging device memory to the designer location via the closed-loop communication link, and

package the printed outputs generated by the digital printer according to the instructions associated with the print job.

Regarding claim 11, Kemp does not teach a digital printer that is configured to “establish a closed-loop communication link with a designer location at which print jobs are created and with a print service provider location at which the print jobs are processed” or “send the current configuration information stored within digital printer memory to the designer location via the closed-loop communication link” for reasons described above in relation to claim 1.

Furthermore, Kemp does not teach “automated packaging device” also for reasons described in relation to claim 1. It logically follows then that Kemp further does not teach an automated packaging device comprising “memory that stores current configuration information about the packaging device and a communications module that is used to communicate with other devices over a network”. For at least the same reason, it follows that Kemp does not teach an automated packaging device that is configured to “communicate over the closed-loop communication link with the designer location and with the print service provider location”, “send the current configuration information stored within the packaging device memory to the designer location via the closed-loop communication link”, or “package the printed outputs generated by the digital printer according to the instructions associated with the print job”.

In view of at least the above, Applicant submits that Kemp does not anticipate claim 11 or the claims that depend therefrom. Applicant therefore requests that the rejections be withdrawn.

III. Claim Rejections - 35 U.S.C. § 103(a)

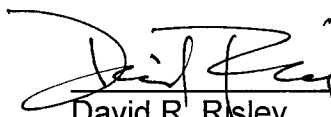
Claims 3 and 13 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Kemp*. Applicant respectfully traverses.

As identified above, *Kemp* does not teach aspects of Applicant's claims. Applicant respectfully submits that claims 3 and 13 are allowable over the *Kemp* for at least the same reasons that claims 1 and 11 are allowable over *Kemp*.

CONCLUSION

Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,



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